

Molly McCarter

From: Rice, Stephanie <srice@blm.gov>
Sent: Thursday, February 7, 2019 5:13 PM
To: Molly McCarter
Subject: Fwd: [EXTERNAL] Fwd: Comments on the NPR-A IAP

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From: **Beth Davidow** <bethdavidow@gmail.com>
Date: Tue, Jan 22, 2019 at 8:34 PM
Subject: [EXTERNAL] Fwd: Comments on the NPR-A IAP
To: <srice@blm.gov>
Cc: <ryan@northern.org>

Dear Ms. Rice,

I have submitted the following on the BLM website, too:

I am writing to express my deep concern, for many reasons I'll explain herein, for the reckless manner in which the BLM is rushing the proposal to open the coastal plain of the Arctic Refuge - an American treasure - to drilling. It is beyond unconscionable that this rush is being done during the shutdown of our government.

I am also deeply distressed at the reckless manner in which the Colville River and Teshepuk Lake special areas are coming under attack.

It is truly alarming that the National Petroleum Reserve Alaska Integrated Activity Plan (NPR-A IAP) is being rewritten to allow more drilling in areas that were recognized decades ago as containing extraordinary wildlife, habitat, and subsistence resources. The BLM is rewriting this plan, seeking to overturn protections for these irreplaceable places and making them available for sale to the oil industry even though millions of acres in the National Petroleum Reserve-Alaska are already available for oil and gas drilling.

These actions are being rushed on an accelerated timeline. With concurrent development proposals across the Arctic, including an EIS for leasing in the Beaufort Sea, seismic testing proposed in the coastal plain of the Arctic Refuge, and the draft EIS on coastal plain leasing released at the end of December, there is not enough time or sufficient hearings for the public to understand and properly comment. This lack of time for comments has been compounded by the government shutdown which left the public unable to contact officials and ask basic questions about times and dates for scheduled hearings which continued despite the shutdown. The public must be involved in decisions that will have major impacts on our climate, health, and economies.

New development will impact the Teshekpuk Caribou Herd in the Teshekpuk Lake Special Area. Under the current IAP there are already significant impacts from development and leases. How will these proposed actions compound existing impacts? New permitted and planned oil projects in areas of the NPR-A that are open for development will bring that development into the Teshekpuk Caribou Herd habitat for the first time. Over half of this herd remains in the Arctic over winter, unlike any other Arctic herd. We don't know yet what the impacts will be to this herd.

Many of the areas under consideration for leasing are critical for subsistence use. It is important to look at the intensity of use in the Special Areas, and provide adequate opportunities for communities in the region to fully participate as cooperating agencies, and through government to government consultation and public meetings.

ConocoPhillips Alaska, Inc. has already initiated development efforts for the Willow Prospect in and around the Teshekpuk Lake Special Area. The Teshekpuk Lake wetlands complex is a safe haven for wildlife. This region provides habitat for a multitude of birds and wildlife, including up to 100,000 molting geese of several species, over half a million shorebirds, high densities of loons and eiders, denning polar bears, and tens of thousands of caribou in the Teshekpuk Caribou Herd. The wetlands North and West of Teshekpuk Lake are targeted by the oil and gas industry for its oil reserves, despite the critical nature of this area's ecological value:

- Teshekpuk Lake in the Western Arctic is one of the most ecologically rich areas in the entire circumpolar Arctic region.
- Areas around Teshekpuk Lake where oil and gas leasing is prohibited should remain as no leasing areas. There is no reason to open more acreage for development and many reasons to keep the Teshekpuk Lake wetlands protected.
- The tundra, ponds, and wetlands surrounding the lake form the habitat that is so critical for birds and wildlife.

The other special areas within NPR-A, which could potentially be impacted, include:

- The Colville River Special Area, which is home to 22 fish species. Bluffs along the river are high-density nesting habitat for birds of prey, including peregrine falcon, gyrfalcon, rough-legged hawk, and golden

eagle. The Colville River delta is a haul-out area for spotted seals, and habitat for a multitude of breeding and migrating birds.

- The Utukok Uplands Special Area protects the core calving ground for the Western Arctic Caribou Herd, Alaska's largest herd. The upper Utukok River is also habitat for moose, high densities of raptors, wolverines, grizzlies, wolves, and pink and chum salmon.
- The Peard Bay Special Area is comprised of small thaw lakes adjacent to the bay. This area is a concentration area for three species of ice seals, polar bears, waterfowl, and shorebirds.
- The Kasegaluk Lagoon Special Area is important for birds and marine mammals. Here, beluga whales give birth to their calves and hundreds of walrus and spotted seals haul out on the barrier islands.

Habitat within the Reserve is already undergoing dramatic changes due to our warming climate . Coastal erosion is changing caribou and goose distribution, and thermokarst is transforming landscapes throughout the region. Increased fossil fuel development means further climate impacts. *The IAP must address these changes.*

BLM must consider and fully analyze cumulative effects of past, present, and reasonably foreseeable future activities , including development not analyzed in the 2013 IAP (e.g., Willow, GMT2), nearshore and offshore Beaufort Sea development (e.g., Liberty), increased development in adjacent state lands, proposed development in the Arctic National Wildlife Refuge, and the State of Alaska's Arctic Strategic Transportation and Resources project.

The Refuge was created (ANILCA, 1980) to protect "nationally significant natural, scenic, historic, archaeological, geological, scientific, wilderness, cultural, recreational, and wildlife values." These are for the "benefit, use, education and inspiration" of present and future generations. The intent of its creation is a public trust. A 2018 Yale University study shows that the majority of every day Alaskans (63%) and US voters (65%) oppose drilling in the Refuge. We travel the world for business and everyone with whom we speak about the Refuge finds it appalling that Refuge drilling is even considered!

BLM must consider and fully analyze a suite of alternatives, including a No Action alternative that fully retains the boundaries and protective measures of the five Special Areas.

Further, in light of ongoing effects of climate change already being felt throughout the Arctic and the NPR-A, more protective alternatives that expand areas of "no new

non-subsistence infrastructure” within special areas need to be considered. There is new science and a new understanding of the effects of climate change since the 2013 IAP was completed that must be considered.

There is no such thing as “environmentally responsible” oil and gas development. As history has shown, time and time again, oil drilling involves a trade-off between environmental values and industrialization. Fossil fuel development is not compatible with the protection of sensitive areas like the Teshekpuk Lake wetlands.

In conclusion, I add my voice to the majority of Americans who oppose oil & gas development in the Arctic Refuge region and its significant special areas. I implore the BLM to stand strong against the dictatorial onslaught that seems to be forcing them into rushing due process to avoid accountability as oil & gas drilling plans are pushed forward under false pretenses, downright lies, and farcical claims – all without allowing Americans their right to public comment - of caring for this world-renowned American treasure.

Although I used to live and work in Alaska, and still consider it my home, I now live in Arizona. Yet, I know how connected my part of the world is to the Refuge and I remain deeply concerned for its future. I firmly believe we must uphold the original purpose of the Refuge in every way, for America and our planet. We must be protectors of these sacred lands.

Respectfully,

Beth Davidow

<https://wildearthvisions.com>



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